



Risk Based Inspections (CG)



CAPT Joshua Reynolds

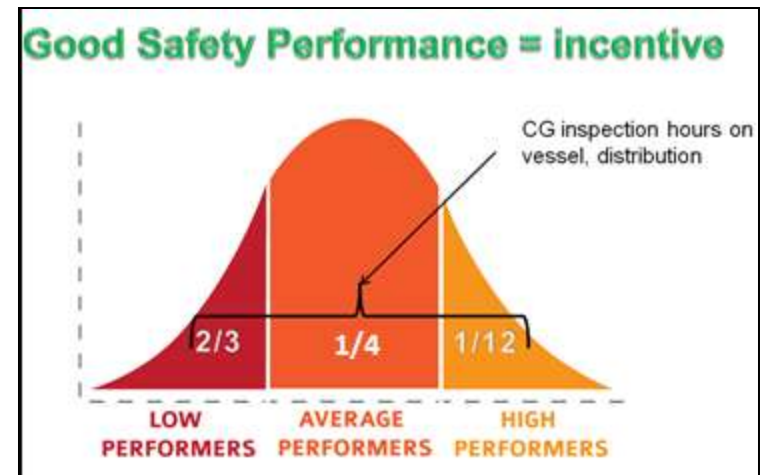
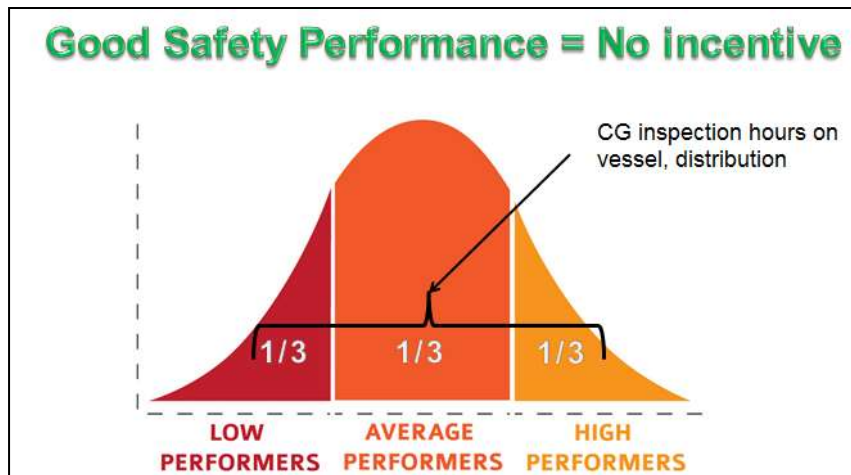
D8(ocs) Industry Day 26 August 2015

USCG Eighth District OCMI



Discussion Items

- What was the “Status Quo” for inspection scheduling frequency and scope?
- What does CG Policy call for?
- What changes will we see in the immediate future?





Relevant Regulations and Policy

33 CFR 143.120 "Floating OCS Facilities"

33 CFR 143.207 "Requirements for Foreign MODUs:

33 CFR 143.210 "Letter of Compliance"

Marine Safety Manual Volume II, COMDTINST M16000.7B, Section G, Chapter

1, paragraph A "Introduction"

1, paragraph B "Scope of Exams"

1, paragraph C "Inspection/Examination Teams"

3, paragraph A, "Certificate of Compliance"



COMDTINST 16000.7B

USCG Marine Safety Manual, Vol. II: Materiel Inspection

SECTION G: OUTER CONTINENTAL SHELF ACTIVITIES

CHAPTER 1: Regulations, Policy and Guidance for a Unit Conducting OCS Activity

CHAPTER 3: Procedures Applicable to MODUs (Foreign)

A. INTRODUCTION

Foreign floating production units and MODUs may not conduct OCS activities on the U.S. OCS without a valid Coast Guard Certificate of Compliance (COC). In order to maintain a valid COC these units must undergo a Coast Guard examination annually.

2. Administration

- a. The OCMI shall NOT schedule or conduct a COC exam until the appropriate user fees have been paid.
- b. COC's are valid for 2 years, or until the unit departs the U.S. OCS, provided the MODU undergoes an annual examination within 3 months before or after the COC anniversary date and continues to meet the requirements of 33 Subchapter N.
- c. To avoid delays, the OCMI is encouraged to complete COCs when requested within three months of their expiration date. At the discretion of, and with the prior approval from, the local OCMI, MODUs with expired COCs (renewal or annual) that are not more than three months past due, and with no indications that the vessel is not in compliance with applicable laws and regulations, should not be restricted from commencing operations prior to an examination.

Same principle for
COIs on FOIs



B. SCOPE OF EXAMS

3. Coastal State

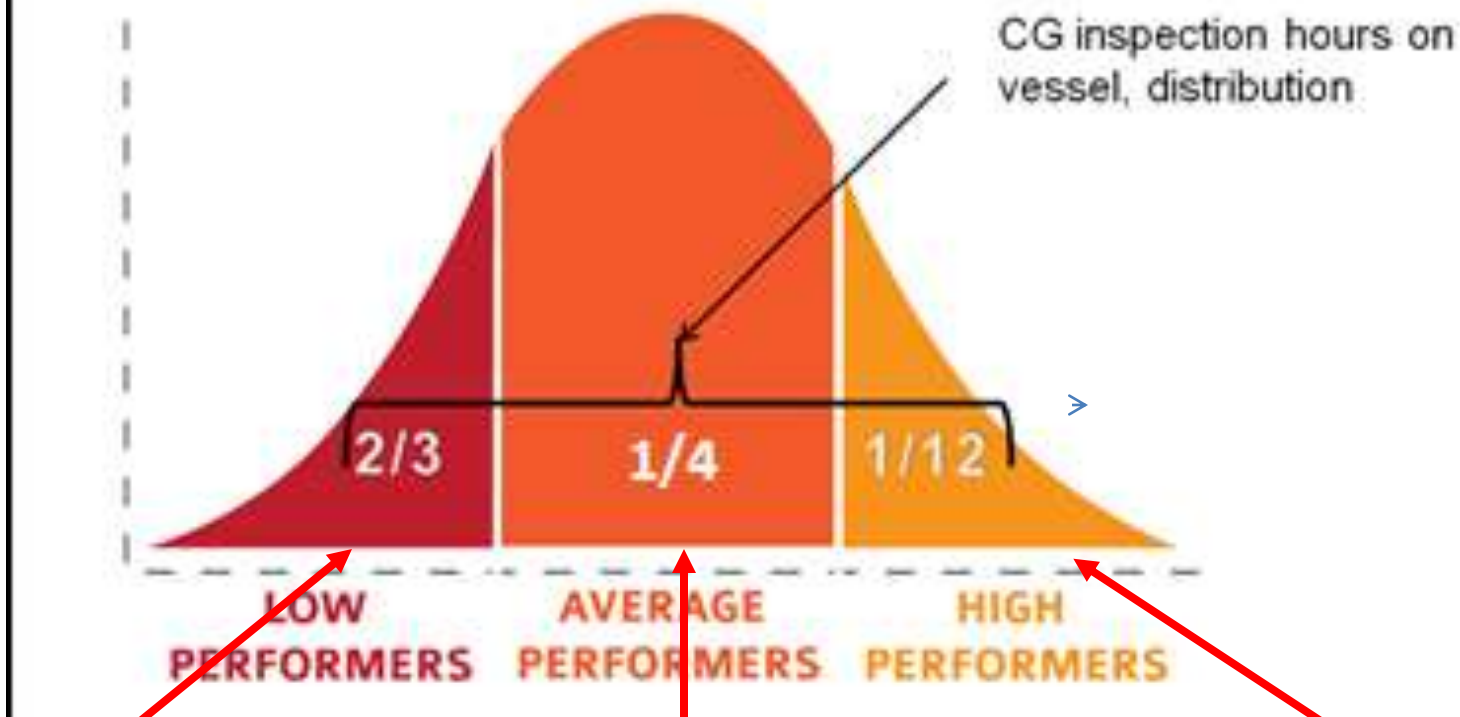
- b. In accordance with 33 CFR 140.101(e) the Coast Guard will recognize and accept valid international certificates issued by signatories to international instruments and will verify compliance by spot checking compliance of any accepted certificate.

C. EXAMINATION/INSPECTION TEAMS

Offshore teams should, at a minimum, contain two members for routine examinations/inspections. One member must be a MODU Inspector certified with the appropriate competency. In some instances, a National Center of Expertise member, Coast Guard travelling inspector, auditor, or other technical expert may be participating in an exam/inspection. These additional participants do not count towards the size of the team.



Good Safety Performance = Incentive



Target Average ~ 3-5 inspectors
8 hours; possible RON or
multiple visits/inspection

Frequency ~ every 10 months

Target Average ~ 2 - 3 inspectors
4-8 hours

Frequency ~ every 12 months

Target Average ~ 2 inspectors
2-4 hours

Frequency ~ every 14 months



10. MODU Matrix

I	II	III	IV	V
MANAGEMENT	FLAG STATE	RECOGNIZED ORGANIZATIONS	MODU HISTORY	MODU PARTICULARS
5 POINTS Listed Lessee, Owner, Operator, or Charterer	7 POINTS Flag State has a detention ratio 2 or more times the overall average for all flag States.	PRIORITY EXAMINATION Detention ratio equal to or greater than 2%	PRIORITY EXAMINATION First time to U.S. or U.S. OCS or no Coast Guard examination in the previous 12 months	5 POINTS Self Propelled
	2 POINTS Flag State has a detention ratio between the overall average and up to 2 times the overall average for all flag States.	5 POINTS Detention ratio less than 2% but greater than or equal to 1%	5 POINTS EACH Operational Control in the previous 12 months	3 POINTS Semi-Submersible
		3 POINTS Detention ratio less than 1% but greater than .5%	1 POINT EACH Reportable marine casualty in the previous 12 months	2 POINTS Jack-Up
		NO POINTS Detention ratio less than .5%	1 POINT EACH Marine violation in the previous 12 months	1 POINT Submersible
			1 POINT EACH Outstanding Deficiency	MODU AGE (USE DELIVERY DATE)
				0-4 years - subtract 3 5-9 years - subtract 2 10-14 years - add 0 15-19 years - add 3 20-24 years - add 5 25+ years - add 7
Total Targeting Score				

Interim phase focus (both MODUs and FOIs); note "past 12 months"



Annual Mandatory Exams

- COC inspections on MODUs (~ 100 MODUs)
- COI inspections on FOIs (~50 FOIs)
- MTSA exams (FOIs and Fixed Platforms; ~40 MTSA)

Discretionary Exams

- Spot Checks of Fixed Platforms (non- MTSA; ~3800 Platforms)
- Random foreign MODU Exams (~50 FOIs)
- Random MTSA exams (FOIs and Fixed Platforms) (~40 MTSA)

Expect more
CG spot
checks



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SECTION G: OUTER CONTINENTAL SHELF ACTIVITIES

CHAPTER 5: Procedures Applicable to Fixed OCS Facilities or Platforms

- c. BSEE ensures compliance with the self-inspection program and conducts spot-check inspections on fixed OCS facilities. The Coast Guard will continue to conduct initial inspections on newly constructed fixed OCS facilities.
- d. While BSEE is acting on behalf of the Coast Guard, there is nothing to prevent a Coast Guard inspector from conducting a spot check inspection on a fixed facility at any time or concurrently with other OCS inspection activities. MIs are encouraged to conduct such spot checks when conducting other activities in the vicinity of a fixed platform. The Coast Guard shall forward the results of all spot check inspections regardless of the findings the appropriate BSEE office.
- e. If the Coast Guard issues a Vessel/Facility Inspection Requirements, Form CG-835, during a spot check inspection, the inspector shall ensure the owner/operator corrects the deficiency within a reasonable time frame (generally no more than 30 days).



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